



Pete Ricketts
Governor

STATE OF NEBRASKA

DEPARTMENT OF NATURAL RESOURCES
Gordon W. "Jeff" Fassett, P.E.
Director

July 18, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Regarding: Comment on Docket RM-11681: Petition for Rulemaking to Allocate the 1675-1680 MHz Band for Terrestrial Mobile Use

Dear Secretary Dortch,

I am writing to you as Director of the Nebraska Department of Natural Resources (Department) to express my deep concern about the proposed allocation of the above-referenced radio bands for cell phone and similar uses. The Department depends on the Geostationary Orbiting Environmental Satellites (GOES) system to support critical state statute-driven activities. The Department is concerned that powerful transmissions in bands adjacent to the relatively weak satellite download bands may compromise the ability of the GOES system to download information in a timely manner.

The Department uses the GOES satellite system to transmit information from approximately 100 stream and canal gauges. The Department uses real-time information from these gauges, as well as several dozen gauges operated by other organizations (including the U.S. Geological Survey and the Bureau of Reclamation) to make critical hour-by-hour water administration decisions. The ability to accurately track available water in the state using the GOES system allows the Department to properly and timely allocate water to the users with the highest priority, thus minimizing negative economic impacts on farmers and businesses across the state from water shortages. In addition, our stream gauge information is used by the National Weather Service and the Nebraska Emergency Management Agency to forecast and mitigate loss of life and property during flooding events. It is critical to these agencies' missions that they have access to up-to-the-minute river stage and discharge values.

In summary, the Nebraska Department of Natural Resources is opposed to the allocation of the 1675-1680 MHz band for terrestrial mobile use. Any potential interference with operation of the GOES system risks threatening the economic security and public safety of Nebraska's citizens.

Sincerely,

Gordon W. Fassett, P.E.
Director